



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NEW YORK 10007

MARY K. SHERWOOD
Assistant Corporation Counsel
msherwoo@law.nyc.gov
Phone: (212) 356-2425
Fax: (212) 356-1148

May 30, 2023

VIA ECF

Honorable Vera M. Scanlon
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Valentine v. City of New York et al., 21-CV-4867 (EK) (VMS)

Your Honor:

I am an Assistant Corporation Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney assigned to the defense in the above-referenced matter. I write to respectfully request a one-week extension of time to respond to Plaintiff's request for tolling ("Plaintiff's Motion") until June 6, 2023. (Dkt. No. 58). The City's response is due today, May 30, 2023. Plaintiff consents to this extension.

The City requests a one-week extension to sufficiently respond to plaintiff's motion and to meet and confer as necessary. Additionally, it should be noted that plaintiff's motion was filed at 8:30 p.m., on Friday, which fell on a three-day weekend. Because of this, the undersigned only had this morning to research Plaintiff's new positions.

Thus, Defendants request an extension of time until June 6, 2023 to respond to Plaintiff's Motion. Thank you for your attention herein.

Respectfully submitted,

A handwritten signature in black ink that reads "Mary K. Sherwood".

Mary K. Sherwood
Assistant Corporation Counsel
Special Federal Litigation Division

Cc: All Counsel of Record (via ECF)